

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK
ALBANY DIVISION

In re)	Hearing Date: June 15, 2016
)	Hearing Time: 9:15 AM
WEN SONG CHEN,)	Hearing Location: Albany, NY
)	
Debtor.)	Case No.: 16-10575-rel
)	Chapter 7

Objection to United States Trustee's Motion to Examine Fees and to
Disgorge Excessive Fees

Yimin Chen, counsel for Debtor Wen Song Chen, submits this Objection to United States Trustee's Motion to Examine Fees and to Disgorge Excessive Fees on the ground that the counsel has complied with the Clerk's notice to correct deficient documents and the legal fees charged is reasonable in light of the situations in this case, and in support, alleges as followings:

1. I have complied with the Clerk's Notice dated March 31, 2016 to submit updated forms on this case. In reply, I have submitted updated forms on April 4, 2016. Copies of the emails between the Clerk and counsel regarding correction of the documents is attached herewith as Exhibit "A".
2. Further, the legal fees charged in this case is reasonable. I have been admitted to the Bar of the State of New York since 2005 and admitted to practice in this district since 2010. My associates, Mr. Bo Shi has been admitted to the Bar of the State of New York since 2010. Mr. Shi has met with the client five times. Each meeting took around one hour. This is because the client did not speak English very well and did not read English. Mr. Shi had to translate all documents into Chinese and explain to the client in his dialect. Mr. Shi also spent around three

hours talking to the client over the phone. He spent two hours to prepare the forms. Additionally counsel lives and works in New York City. Counsel spent around four hours one way to commute from New York City to Albany for the 341 meeting and another four hours to travel back. A copy of the google map showing the traveling time is attached herewith as Exhibit "B". Counsel spent around \$180 in traveling expenses for the 341 meeting. The total time spent on this case is more than fifteen hours. The hourly charge is \$350. In light of these facts for this case, the legal fees of \$3,800.00 is reasonable. Further, the client has been fully explained with the legal fees and scope of representation in his dialect. He understood and agreed to pay the fees.

3. The U.S. Trustee also alleges that I did not disclose the debtor's ownership interest in 1881 Central LLC. That is not true. The debtor's ownership in 1881 Central LLC. was disclosed on the petition. See Part 1.4 of the Form 101 and Part 11 of the Form 107. A copy of the submitted forms is attached herewith as Exhibit "C".

Therefore, the undersigned respectfully request that the U.S. Trustee's motion be denied in its entirety.

Dated: Queens, New York
June 2, 2016

By: /s/ Yimin Chen
Yimin Chen, Esq.
Counsel for Debtor
39-15 Main Street, Suite 502
Flushing, NY 11354
Tel: (718)886-1858